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Williams Charles Construction
Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LANCE D. STUCKEY, JR., individually and on
behalf of all other similarly situated,

Plaintiffs,

vs.

APEX MATERIALS, LLC, ELKHORN
ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDO LLC, BRENT CONRAD,
BRANDON CONRAD, PATRICIA CONRAD,
LAS VEGAS PAVING CORPORATION, TAB
CONTRACTORS, INC., WILLIAM CHARLES
CONSTRUCTION COMPANY, HARBER
COMPANY, INC., John Does I to XX, name
fictitious true name and number of persons being
unknown, and XYZ Corporations I to XX, name
fictitious true name of number of entities being
unknown,

Defendants.

Case No. 2:22-cv-01964-APG-EJY

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Lance D. Stuckey, Jr. ("Plaintiff"),
through his counsel Leon Greenberg Professional Corporation, and Defendant William Charles
Construction Company ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall
have an extension up to and including April 14, 2023, in which to file a response to Plaintiff's
Complaint. This Stipulation is submitted and based upon the following:

3. Counsel for Defendant has been in communication with Plaintiff's counsel regarding a potential resolution amongst the several named defendants.

4. Accordingly, the parties agreed to extend Defendant's deadline to file an Answer from February 2, 2023, to April 14, 2023.

5. This is the first request for an extension of time for Defendant to file a response to Plaintiff's Complaint.

6. This request is made in good faith and not for the purpose of delay.

Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 7th day of March, 2023.

LEON GREENBERG PROFESSIONAL CORPORATION JACKSON LEWIS P.C.

/s/ Leon Greenberg
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RUTHANN DEVEREAUX-GONZALEZ, ESQ.
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/s/ Lynne K. McChrystal
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*Attorneys for Plaintiff
Lance D. Stuckey, Jr.*

*Attorneys for Defendant
William Charles Construction Company*

ORDER

IT IS SO ORDERED:

~~United States District Court Judge /~~
United States Magistrate Judge

Dated: 3-9-2023